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Clerk, U.S. District Court Texas Eastern

UNITED STATES OF AMERICA **\$** \$ \$ \$ \$ Case No. 4:25CR- 142 Judge V. JCB/JOL CELSO MANUEL GAMBOA SANCHEZ

### **INDICTMENT**

THE UNITED STATES GRAND JURY CHARGES:

#### **Count One**

Violation: 21 U.S.C. § 963 (Conspiracy to Manufacture and Distribute Cocaine, Intending, Knowing, and Having Reasonable Cause to Believe it would be Unlawfully Imported into the United States)

Beginning in or about 2017, and continuing thereafter through the date of this Indictment, within the extraterritorial jurisdiction of the United States, including locations in and adjacent to Colombia, Panama, Costa Rica, Honduras, Guatemala, Mexico, and various countries throughout South, Central, and North America and elsewhere, the defendant,

### CELSO MANUEL GAMBOA SANCHEZ,

did knowingly and intentionally combine, conspire, confederate, and agree with other persons known and unknown to the Grand Jury, to commit the following offense against the United States: to knowingly and intentionally manufacture and distribute five or more kilograms of a mixture and substance containing a detectable amount of cocaine, a

Schedule II controlled substance, intending, knowing, and having reasonable cause to believe that such substance would be unlawfully imported into the United States, in violation of 21 U.S.C. §§ 959(a) and 960. All in violation of 21 U.S.C. § 963.

### **Count Two**

Violation: 21 U.S.C. § 959 (Manufacturing and Distributing Cocaine, Intending, Knowing, and Having Reasonable Cause to Believe it would be Unlawfully Imported into the United States) and 18 U.S.C. § 2 (Aiding and Abetting)

On multiple dates beginning in or about 2017 and continuing thereafter through the date of this Indictment, within the extraterritorial jurisdiction of the United States, including locations in and adjacent to Colombia, Panama, Costa Rica, Honduras, Guatemala, Mexico, and various countries throughout South, Central, and North America and elsewhere, the defendant,

#### CELSO MANUEL GAMBOA SANCHEZ,

aided and abetted by others, did knowingly and intentionally manufacture and distribute five or more kilograms of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, intending, knowing, and having reasonable cause to believe that such substance would be unlawfully imported into the United States. All in violation of 21 U.S.C. § 959 and 18 U.S.C. § 2.

## NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

Pursuant to 21 U.S.C. §§ 853 and 970, 28 U.S.C. § 2461(c).

As the result of committing the offenses charged in this Indictment, the defendant shall forfeit to the United States pursuant to 21 U.S.C. §§ 853(a) and 970, any property constituting or derived from proceeds obtained, directly or indirectly, as a result of such offenses, and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offenses.

As authorized by 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c), the United States intends to seek forfeiture of substitute property belonging to the defendant if, as a result of the defendant's act or omission, any property subject to forfeiture (1) cannot be located upon the exercise of due diligence, (2) has been transferred or sold to, or deposited with, a third party, (3) has been placed beyond the jurisdiction of the court, (4) has been substantially diminished in value, or (5) has been commingled with other property which cannot be divided without difficulty.

A TRUE BILL,

GRAND JURY FOREPERSON

7/0/25

JAY R. COMBS

Acting United States Attorney

Assistant United States Attorney

DATE

# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	Case No. 4:25CR-
v.	§	Judge
	§	
CELSO MANUEL GAMBOA	§	
SANCHEZ	§	

## **NOTICE OF PENALTY**

## **Counts One and Two**

Violations: 21 U.S.C. §§ 959 and 963.

Imprisonment for not less than 10 years nor more than life, a fine not to Penalties: exceed \$10,000,000, and a term of supervised release of at least 5 years.

> If the defendant has a previous conviction under the above statutes, the imprisonment term, fine amount, and supervised release term are double that otherwise authorized for an initial violation of those statutes.

Special

Assessment: \$100.00 per count